

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**1:18-CV-24227-CMA-Altonaga**

|                                   |   |
|-----------------------------------|---|
| JASON MILLER,                     | ) |
|                                   | ) |
|                                   | ) |
| Plaintiff,                        | ) |
|                                   | ) |
|                                   | ) |
| vs.                               | ) |
|                                   | ) |
| GIZMODO MEDIA GROUP, LLC,         | ) |
| a Delaware Corporation, KATHERINE | ) |
| KRUEGER, individually, and WILL   | ) |
| MENAKER, individually,            | ) |
|                                   | ) |
| Defendants.                       | ) |

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**UNOPPOSED MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Abigail Everdell of the law firm of Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, New York 10020, (212) 489-8230, for purposes of appearance as co-counsel on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Abigail Everdell to receive electronic filings in this case, and in support thereof states as follows:

1. Abigail Everdell is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar of the State of New York. Attached hereto is a certificate of good standing from the Clerk of the Appellate Division of the New York Supreme Court, First Department.

2. Movant Deanna K. Shullman, Esquire, of the law firm of Shullman Fugate PLLC, 2101 Vista Parkway, Suite 4006, West Palm Beach, Florida 33411, (561) 429-3619, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as the member of the Bar of this Court with whom opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Abigail Everdell has made payment of this Court's \$75.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Abigail Everdell, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Abigail Everdell at the e-mail address: AbigailEverdell@dwt.com.

WHEREFORE, Deanna K. Shullman moves this Court to enter an Order for Abigail Everdell to appear before this Court on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Abigail Everdell.

Date: June 20, 2019

Respectfully submitted,  
/s/ Deanna K. Shullman  
Deanna K. Shullman  
Florida Bar No. 0514462  
dshullman@shullmanfugate.com

SHULLMAN FUGATE PLLC  
2101 Vista Parkway, Suite 4006  
West Palm Beach, FL 33411  
Tel: (561) 429-3619  
*Attorney for Defendants Gizmodo Media Group  
LLC and Katherine Krueger*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

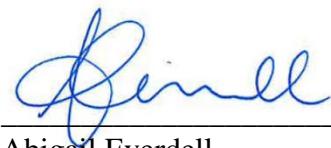
**1:18-CV-24227-CMA-Altonaga**

JASON MILLER, )  
                    )  
Plaintiff,       )  
                    )  
vs.               )  
                    )  
GIZMODO MEDIA GROUP, LLC,       )  
a Delaware Corporation, KATHERINE   )  
KRUEGER, individually, and WILL    )  
MENAKER, individually,             )  
                    )  
Defendants.       )

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**CERTIFICATION OF ABIGAIL EVERDELL**

Abigail Everdell, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the State of New York Bar.



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Abigail Everdell

Case No. 1:18-cv-24227-CMA

**CERTIFICATION PURSUANT TO S.D. FLA. L.R. 7.1(a)(3)**

Defendants' undersigned counsel, Deanna K. Shullman, hereby certifies that counsel for Defendants has conferred with counsel for Plaintiff and they have consented to the filing of this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filings was served by CM/ECF on June 20, 2019, on all counsel or parties of record on the service list.

/s/ Deanna K. Shullman  
Deanna K. Shullman

**Case No. 1:18-cv-24227-CMA**

**SERVICE LIST**

*Attorneys for Plaintiff:*

Kenneth G. Turkel, Esq.  
kturkel@bajocuva.com  
Shane B. Vogt, Esq.  
shane.vogt@bajocuva.com  
BAJO CUVA COHEN TURKEL  
100 N. Tampa Street, Ste. 1900  
Tampa, FL 33602  
Telephone: (813) 443-2193

*Attorneys for Defendants Gizmodo Media Group, LLC and Katherine Krueger:*

Elizabeth A. McNamara (*pro hac vice*)  
Katherine M. Bolger (*pro hac vice*)  
Claire K. Leonard (*pro hac vice*)  
DAVIS WRIGHT TREMAINE  
1251 Avenue of the Americas, 21<sup>st</sup> Floor  
New York, New York 10020  
Telephone: (212) 489-8230  
lizmcnamara@dwt.com  
katebolger@dwt.com  
claireleonard@dwt.com



**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Abigail Bain Everdell was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 20<sup>th</sup> day of May 2015, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on June 14, 2019.



Clerk of the Court



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**1:18-CV-24227-CMA-Altonaga**

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**[PROPOSED] ORDER GRANTING MOTION TO APPEAR  
*PRO HAC VICE*, CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Abigail Everdell (the “Motion”), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Abigail Everdell may appear and participate in this action on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger. The Clerk shall provide electronic notification of all electronic filings to Abigail Everdell at [AbigailEverdell@dwt.com](mailto:AbigailEverdell@dwt.com).

DONE AND ORDERED in Chambers at \_\_\_\_\_, Florida, this  
\_\_\_\_ day of \_\_\_\_\_, 2019.

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Hon. Cecilia Altonaga  
United States District Judge

Copies furnished to:  
All Counsel of Records